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Attorney for Defendant  
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-206-DAD
	)	
Plaintiff,	)	STIPULATION FOR TEMPORARY
	)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.	)	RELEASE; [ <del>PROPOSED</del> ] ORDER
	)	
JOEY DONALD STEWART	)	Hon. Allison Claire
CAMPBELL,	)	
	)	
Defendant.	)	

The defendant, JOEY DONALD STEWART CAMPBELL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Roger Yang, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Campbell's pretrial release to permit him to attend a holiday dinner with his mother at the High Steaks Restaurant at Thunder Valley Casino in Lincoln, CA. The parties have conferred with Mr. Campbell's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Campbell has been on pretrial release in this district since October 2021, on a \$100,000 secured appearance bond. *See* Dkt. 12. Mr. Campbell is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Campbell is subject to home detention, and therefore must remain inside his residence except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court ordered obligations; or other activities

1 authorized by the pretrial services officer<sup>1</sup>.

2 Mr. Campbell requests, and the parties agree and so stipulate, that his Conditions of  
3 Release be temporarily amended to specifically permit him to attend a holiday dinner with his  
4 mother at the High Steaks Restaurant at Thunder Valley Casino in Lincoln, CA on November 26,  
5 2022, from 5:00 p.m. to 8:00 p.m. Given the location of the event, there will be no minors  
6 present/permitted within the restaurant or casino. Mr. Campbell's mother will be in attendance  
7 with him and will be responsible for driving Mr. Campbell to and from the dinner.

8 Thunder Valley Casino is approximately 30 minutes by car from Mr. Campbell's  
9 residence. Allowing some additional time for traffic, the parties request a temporary  
10 modification of pretrial conditions to permit Mr. Campbell depart his home at 4:15 p.m. on  
11 Saturday, November 26, 2022, and to return home by 9:00 p.m. that same day. Mr. Campbell  
12 will return directly to his residence at the conclusion of the dinner.

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28 <sup>1</sup> Pretrial services interprets this condition to only permit their approval of other activities which are deemed essential, with all other activities requiring the approval of the Court.

1 The proposed temporarily amended condition is attached to this request. The parties do  
2 not request a hearing in this matter in light of this stipulation.

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4 Respectfully submitted,  
5 DATED: November 21, 2022 HEATHER E. WILLIAMS  
6 Federal Defender  
7 /s/ Megan T. Hopkins  
8 MEGAN T. HOPKINS  
9 Assistant Federal Defender  
10 Attorney for JOEY DONALD STEWART CAMPBELL


11  
12 DATED: November 21, 2022 PHILLIP A. TALBERT  
13 United States Attorney  
14 /s/ Roger Yang  
15 ROGER YANG  
16 Assistant United States Attorney  
17 Attorney for the United States

18 **[PROPOSED] ORDER**

19 GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the  
20 Special Conditions of Release for defendant, Joey Donald Stewart Campbell, be Temporarily  
21 Amended such that he is permitted to depart his residence at 4:15 p.m. on Saturday, November  
22 26, 2022, to attend a holiday dinner with his mother, and to return home by 9:00 p.m. that same  
23 day. All other conditions of pretrial release shall remain in force.

24 The Temporary Amended Special Condition of Release is hereby adopted.

25 DATED: November 21, 2022

26   
27 ALLISON CLAIRE  
28 UNITED STATES MAGISTRATE JUDGE